

Kevin C. Barrett, State Bar No. 020104
Amanda J. Taylor, State Bar No. 024006
Graif Barrett & Matura, P.C.
1850 North Central Avenue, Suite 500
Phoenix, Arizona 85004
Telephone: (602) 792-5700
Facsimile: (602) 792-5710
kbarrett@gbmlawpc.com
ataylor@gbmlawpc.com

*Attorneys for Defendant American Family
Mutual Insurance Company*

UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA

TYLER JACOBSON, an individual,

Plaintiff,

v.

AMERICAN FAMILY MUTUAL
INSURANCE COMPANY, a foreign
corporation; XYZ Corporations I-X; and
Partnerships I-X,

Defendants.

Case No.:

NOTICE OF REMOVAL

Defendant American Family Mutual Insurance Company (“American Family”), by and through counsel undersigned, submits this Notice of Removal pursuant to 28 U.S.C. § 1446(a) and provides the following grounds for removal.

1. This matter was commenced in the Superior Court of the State of Arizona in and for the County of Maricopa on October 30, 2017 with the filing of a Complaint, Certificate of Arbitration, Demand for Jury Trial, and Offer of Judgment.

2. The Summons, Affidavit of Service, Complaint, Certificate of Arbitration, Civil Cover Sheet, and Demand for Jury Trial constitutes all process and proceedings filed and served on American Family in the case, copies of which are attached hereto at Exhibit A.

3. Defendant American Family is a stock insurance company, whose parent company is AmFam Holdings, Inc., a wholly owned subsidiary of American Family Insurance Mutual Holding

1 Company, a domestic insurance holding company with its principal place of business and
2 citizenship in the State of Wisconsin. Plaintiff Tyler Jacobson is a resident of the State of Arizona
3 (*see* Complaint, attached as Exhibit A).

4 4. This action is one over which the United States District Courts have jurisdiction
5 pursuant to 28 USC § 1332, by reason of the diversity of the citizenship of the parties.

6 5. Defendant American Family has not pled, answered, or otherwise appeared in this
7 action.

8 6. Defendant American Family has filed this Notice within 30 days after receipt of the
9 initial pleading setting forth the claim for relief upon which the action is based, and within one year
10 after the commencement of the action. Removal is therefore timely pursuant to 28 U.S.C. §
11 1446(b).

12 7. The amount in controversy exceeds the requisite \$75,000. (*See* Complaint, attached
13 as Exhibit A).

14 8. A copy of this Notice is being filed with the Clerk of the Superior Court of the State
15 of Arizona in and for the County of Maricopa.

16 WHEREFORE, Defendant American Family respectfully requests that this action be
17 removed from the Superior Court of Arizona in and for the County of Maricopa to the United
18 States District Court for the District of Arizona, and that further proceedings in the Superior Court
19 of Arizona in and for the County of Maricopa regarding the action be stayed pursuant to 28 U.S.C.
20 § 1446.

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1 Dated this 29th day of November, 2017.

2 **GRAIF BARRETT & MATURA, P.C.**

3
4 By /s/ Kevin C. Barrett
5 Kevin C. Barrett
6 Amanda J. Taylor
7 1850 North Central Avenue, Suite 500
8 Phoenix, Arizona 85004
9 *Attorneys for Defendant American Family*
10 *Mutual Insurance Company*

9 ORIGINAL e-filed on
10 November 29th, 2017 with:

11 Clerk of the Court
12 Maricopa County Superior Court
13 101 West Jefferson Street
14 Phoenix, Arizona

13 COPY mailed this same date to:

14 Brett L. Slavicek
15 James E. Fucetola
16 Trevor R. Orme
17 The Slavicek Law Firm
18 5500 N. 24th Street
19 Phoenix, AZ 85016
20 *Attorneys for Plaintiff*

18 By: /s/Leanna Levine
19 Leanna Levine